



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 27, 2008

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VIA FACSIMILE

The Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Rosemary Borrel,
08 Cr. 348 (PAC)**

Dear Judge Crotty:

I spoke last night with Martin Cohen, Esq., of the Federal Defenders of New York, Inc., who now represents Rosemary Borrel, the defendant, in place of her prior counsel Hugh Mundy, Esq. Mr. Cohen and the Government jointly request that the status conference in the above-captioned matter, now scheduled for July 8, 2008, be adjourned until a date convenient to the court in late August, 2008.

The Government and the defense are engaged in good-faith negotiations about a possible disposition of this case. However, due in part to the fact that Ms. Borrel has experienced a few complications relating to her pregnancy and is also due to give birth in August 2008, those discussions are taking more time than the parties had anticipated.

For the foregoing reasons, the Government also respectfully requests that the Court exclude time under the Speedy Trial Act from today until the next conference date. The ends of justice served by the continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow the parties to continue their discussions about a possible disposition of the case, enable new counsel to review the discovery the Government produced, and assure the effective assistance of counsel.

MEMO ENDORSED

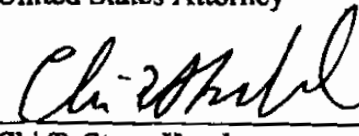
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The Honorable Paul A. Crotty
June 27, 2008
Page 2

Mr. Cohen consented both to the request for adjournment and to the request to exclude time under the Speedy Trial Act until the next status conference date.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By: 
Chi T. Steve Kwok
Assistant United States Attorney
Tel: (212) 637-2415

cc: Martin Cohen, Esq. (by fax)
Counsel for the defendant

Application GRANTED. The conference is adjourned to 8/28/08 at 3:15 pm in Courtroom 20-C. It is further that pursuant to 18 U.S.C. 3161 (b) (8) (A), the time from 7/8/08 until 8/28/08 is excluded in the interest of justice. I find that this exclusion outweighs the best interest of the defendant and the public is a speedy trial. So Ordered.

SO ORDERED JUN 27 2008


HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE